

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

JASPER WIRTSCHAFTER, *et al.*,)
)
 Plaintiffs,)
)
 v.) No. 1:24-cv-754-RLY-MJD
)
 PAMELA WHITTEN, *et al.*,)
)
 Defendants.)

Plaintiffs' Statement of Claims

Plaintiffs, by their counsel, set out their Statement of Claims in this case as follows.

1. The actions of defendants Whitten and Hutton, in their individual capacities, in issuing and allowing to be issued no-trespass orders against the plaintiffs, which resulted in them being banned from exercising their rights to expression in a public forum, violated the First Amendment.

2. The Expressive Activity Policy (eff. August 1, 2024) and the amended Expressive Activity Policy (eff. Nov. 15, 2024), improperly prohibit and restrict expressive activities that occur in Indiana University's public spaces between 11:00 p.m. and 6:00 a.m., and the policies violate the First Amendment.

WHEREFORE, plaintiffs submit their Statement of Claims.

Kenneth J. Falk
Gavin M. Rose
Stevie J. Pactor

ACLU of Indiana
1031 E. Washington St.
Indianapolis, IN 46202
317/635-4059
fax: 317/635-4105
kfalk@aclu-in.org
grose@aclu-in.org
spactor@aclu-in.org

Attorneys for Plaintiffs